

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
BECKLEY DIVISION**

DONALD L. BLANKENSHIP,

Movant,

vs.

UNITED STATES OF AMERICA,

Respondent.

**Civil Action No. 5:18-CV-00591
(Criminal Action No. 5:14-CR-00244)**

**UNITED STATES' UNOPPOSED MOTION
FOR ENTRY OF THE AGREED-UPON PROTECTIVE ORDER**

The United States, by and through undersigned counsel, submits this Unopposed Motion for Entry of the Agreed-Upon Protective Order, which is attached. (Ex. 1.)

As the agreed-upon Protective Order explains, the information subject to the Protective Order qualifies for protection under Fed. R. Civ. P. 26(c), and good cause exists for restricting dissemination of the information on the ground that harm would result from its disclosure. *See* S.D.W. Va. Civ. R. 26.4(b); Fed. R. Civ. P. 26(c).

Moreover, in accordance with S.D.W. Va. Civ. R. 26.4(b), good cause exists for the following reasons to allow modification to the District's preferred protective order: (1) the information subject to the Order is highly confidential; (2) the agencies also subject to the Order do not, in the ordinary course, release the information at issue; (3) and the Order is the product of an agreement by the parties and any agencies that might release information subject to the Order.

For these reasons, the parties respectfully request that the Court enter the attached Agreed-Upon Protective Order.

Respectfully submitted,

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United States Attorney General

BENJAMIN C. GLASSMAN
United States Attorney
Southern District of Ohio

/s/Douglas W. Squires

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CERTIFICATE OF SERVICE

I, Douglas W. Squires, certify that on July 26, 2018 the foregoing document was served on all parties or their counsel of record through the CM/ECF system if they are registered users, or if they are not, by serving a true and correct copy at the addresses listed below:

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